

Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

EMERENCIANA PETER-PALICAN)	CIVIL. ACTION NO. 07-0022
)	
Plaintiff,)	
)	ANSWER TO FIRST SET OF
-v-)	INTERROGATORIES AND
)	REQUEST FOR PRODUCTION OF
)	DOCUMENTS
GOVERNMENT OF THE)	
COMMONWEALTH OF THE)		
NORTHERN MARIANA ISLANDS,)		
and TIMOTHY P. VILLAGOMEZ)		
in his official and individual capacities,)	
)	
Defendants.)	
_____)	

Comes now Emerenciana Peter-Palican and for this her answers to interrogatories
and response to request for production of documents states:

ANSWERS TO INTERROGATORIES

Interrogatory no. 1.

After the jury had left the courtroom, Judge Munson asked if there were anything
else to be addressed. At that time I stated that I wanted my civil service position back with
a lateral transfer. Mr. Dollison then said “Mrs. Palican are you going to give up the special

protected in civil service and then we ended up in here.” Mr. Dollison then said, [B]ut your special assistant position is also protected under the constitution.” I said “Oh, I didn’t know that.” Judge Munson, addressing Mr. Dollison, then asked isn’t this position just effective under the Babauta-Benavente administration. Mr. Dollison then said, “[N]o, your honor, under the constitution she can only be terminated for cause.” Judge Munson then said words to the effect that if this case arises again will the Attorney General’s Office represent Mrs. Palican. Mr. Dollison then said, “Yes”

Interrogatory no. 2.

Yes.

Interrogatory no. 3.

A. I spoke with Juan I. Tenorio a few weeks after the trial while both of us were at a Youth Affairs Convention. I mentioned to him that I had been unaware until the statements after trial that the special assistant for women’s affairs could only be terminated for cause. Mr. Tenorio said yes, that the only way a person could leave the position is by resigning or being terminated for cause.

B. I spoke with Frank Gibson, a few days after the end of the trial on the phone. He was employed in the personnel department and I spoke with him at times regarding personnel matters. At one conversation I commented about the holder of the special assistant for women’s affairs position being protected by the constitution. Mr.

terminated for cause.

Interrogatory no. 4.

A. NOPA- I don't recall receiving this document until July 2002, or later.

B. Request for Personnel Action - I don't recall receiving this document until
July 2002, or later.

C. Conditions of Employment - I received this document on the date I signed
it.

Interrogatory no. 5.

Yes

Interrogatory no. 6.

I was very active and vocal in the gubernatorial campaign which Governor Fitial
won. I supported Governor Babauta publicly, attending and participating in rally's, street
demonstrations, and soliciting votes.

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

1. Plaintiff objects to this request as being overly broad and not susceptible of any
precise delineation as to documents requested.

I declare under penalty of perjury that the answers to interrogatories are true and
correct to the best of my knowledge.

Emerenciana Peter-Palican

Emerenciana Peter-Palican *12/22/2002*

Dated this 22nd day of December, 2007.

DOUGLAS F. CUSHNIE
Attorney for Plaintiff

/s/
DOUGLAS F. CUSHNIE